



**August 3, 2018**

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington DC 20554

**Re: CGKC&H No. 2 Rural Cellular Limited Partnership  
E911 Location Accuracy Progress Report  
PS Docket No. 07-114**

Womble Bond Dickinson (US) LLP

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Dear Ms. Dortch:

Pursuant to 47 C.F. R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of CGKC&H No. 2 Rural Cellular Limited Partnership, is its E911 location accuracy progress report.

Should you have any questions, please contact undersigned counsel.

Best regards,

**Womble Bond Dickinson (US) LLP**

*/s/ Michael R. Bennet*

Michael R. Bennet  
Partner

Attachment

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

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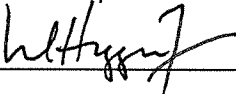
Wireless E911 Location Accuracy Requirements ) PS Docket No. 07-114

**CGKC&H No. 2 Rural Cellular Limited Partnership E911 Location Accuracy 36 Month Progress Report**

CGKC&H No. 2 Rural Cellular Limited Partnership ("CGKC&H"), pursuant to Section 20.18(i)(4)(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its 36 month progress report.

CGKC&H is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. CGKC&H entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable CGKC&H to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). CGKC&H has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(2) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

Although CGKC&H complies with the current location accuracy benchmark, it has been working to improve its location accuracy and installed a new server during the fourth quarter of 2017. CGKC&H plans to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmarks, and then make network improvements and adjustments to existing sites as necessary. CGKC&H will make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by CGKC&H that has the capability to deliver barometric sensor data. Because CGKC&H does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Mike Higgins, Jr.

General Manager

Date: August 2, 2018